

1
2 **UNITED STATES DISTRICT COURT**
3 **DISTRICT OF NEVADA**

4
5 UNITED STATES OF AMERICA,
6
7 Plaintiff,

8 vs.
9
10 JASON LEE ROBERTS,
11 Defendant.

12 Case No. 2:17-cr-00258-APG-GWF

13 **Preliminary Order of Forfeiture**

14	FILED	RECEIVED
15	ENTERED	SERVED ON
16	COUNSEL/PARTIES OF RECORD	
17	NOV 30 2017	
18	CLERK US DISTRICT COURT	
19	DISTRICT OF NEVADA	
20	BY:	DEPUTY

21 This Court finds that defendant Jason Lee Roberts pled guilty to Counts Four

22 and Eleven of a Twenty-Three-Count Criminal Indictment charging him in Count
23 Four with Possession of Stolen Mail, in violation of Title 18, United States Code,
1 Section 1708, and in Count Eleven with Possession of Fifteen or More Counterfeit or
2 Unauthorized Access Devices, in violation of Title 18, United States Code, Section
3 1029(a)(3). Criminal Indictment, ECF No. 16; Change of Plea, ECF No. __; Plea
4 Agreement, ECF No. __.

5 This Court finds defendant Jason Lee Roberts agreed to the forfeiture of the
6 property and the imposition of the in personam criminal forfeiture money judgment
7 set forth in the Plea Agreement, the Bill of Particulars, and the Forfeiture Allegation
8 of the Criminal Indictment and in compliance with Honeycutt v. United States,
9 __U.S.__, 137 S. Ct. 1626 (2017). Criminal Indictment, ECF No. 16; Bill of
10 Particulars, ECF No. 45; Change of Plea, ECF No. __; Plea Agreement, ECF No. __.

11 This Court finds, pursuant to Fed. R. Crim. P. 32.2(b)(1) and (2), the United
12 States of America has shown the requisite nexus between property set forth in the
13

1 Plea Agreement, the Bill of Particulars, and the Forfeiture Allegation of the Criminal
2 Indictment and the offenses to which defendant Jason Lee Roberts pled guilty.

3 The following property and money judgment are (1) any property, real or
4 personal, which constitutes or is derived from proceeds traceable to violations of Title
5 18, United States Code, Section 1029(a)(3), or a conspiracy to commit such offense;
6 (2) any property, real or personal, which constitutes or is derived from proceeds
7 traceable to violations of Title 18, United States Code, Section 1708, a specified
8 unlawful activity as defined in Title 18, United States Code, Section 1956(c)(7)(D),
9 or a conspiracy to commit such offense; (3) any property constituting, or derived from,
10 proceeds obtained directly or indirectly, as the result of violations of Title 18, United
11 States Code, Section 1029(a)(3); and (4) any personal property used or intended to
12 be used to commit the violations of Title 18, United States Code, Section 1029(a)(3),
13 and are subject to forfeiture pursuant to Title 18, United States Code, Section
14 981(a)(1)(C) with Title 28, United States Code, Section 2461(c); Title 18, United
15 States Code, Section 982(a)(2)(B); Title 18, United States Code, Section 1029(c)(1)(C)
16 and (c)(2); and Title 21, United States Code, Section 853(p):

17 i. any and all fraudulent identification documents including, but not limited
18 to at least:

19 a) any and all social security cards including, but not limited to at
20 least:

- 21 1. Card No. XXX-XX-8066 in the name of E.C.;
22 2. Card No. XXX-XX-1811 in the name of K.G.;
23 3. Card No. XXX-XX-7783 in the name of N.M.;

- 1 4. Card No. XXX-XX-8840 in the name of B.M.;
- 2 b) any and all driver's licenses or identification cards including, but not
- 3 limited to at least:
- 4 1. Nevada identification card in the name of S.S.;
- 5 2. Nevada driver's license in the name of A.B.;
- 6 3. Brazil identification card in the name of G.W.;
- 7 4. Netherlands driver's license in the name of R.D.;
- 8 5. Netherlands driver's license in the name of N.B.;
- 9 6. Nevada driver's license in the name of S.B.;
- 10 7. Nevada driver's license in the name of L.F.;
- 11 8. Nevada driver's license in the name of J.C.;
- 12 9. Nevada driver's license in the name of T.G.;
- 13 10. California driver's license in the name of T.S.;
- 14 11. California driver's license in the name of B.M.;
- 15 ii. any and all fraudulent access devices including, but not limited to at least:
- 16 a) any and all credit or debit cards including, but not limited to at least:
- 17 1. Card No. XXXX-XXXX-XXXX-8335 in the name of B.B.;
- 18 2. Card No. XXXX-XXXX-XXXX-2267 in the name of L.P.;
- 19 3. Card No. XXXX-XXXX-XXXX-0566 in the name of M.C.;
- 20 4. Card No. XXXX-XXXX-XXXX-2103 in the name of D.L.;
- 21 5. Card No. XXXX-XXXX-XXXX-0297 in the name of M.B.;
- 22 6. Card No. XXXX-XXXX-XXXX-7484 in the name of M.S.;
- 23 7. Card No. XXXX-XXXX-XXXX-5331 in the name of N.V.;

- 1 8. Card No. XXXX-XXXX-XXXX-5324 in the name of A.M.;
- 2 9. Card No. XXXX-XXXX-XXXX-7204 in the name of S.C.;
- 3 10. Card No. XXXX-XXXX-XXXX-0170 in the name of B.P.;
- 4 11. Card No. XXXX-XXXX-XXXX-4213 in the name of B.P.;
- 5 12. Card No. XXXX-XXXX-XXXX-0270 in the name of D.K.;
- 6 13. Card No. XXXX-XXXX-XXXX-3278 in the name of L.V.;
- 7 14. Card No. XXXX-XXXX-XXXX-2673 in the name of M.C.;
- 8 15. Card No. XXXX-XXXX-XXXX-7239 in the name of K.M.;
- 9 16. Card No. XXXX-XXXX-XXXX-8031 in the name of J.C.;
- 10 17. Card No. XXXX-XXXX-XXXX-5289 in the name of T.F.;
- 11 18. Card No. XXXX-XXXX-XXXX-3335 in the name of A.B.;
- 12 19. Card No. XXXX-XXXX-XXXX-0615 in the name of A.B.;
- 13 20. Card No. XXXX-XXXX-XXXX-5420 in the name of A.B.;
- 14 b) any and all notebooks, checks, and papers containing credit or debit
15 card numbers including, but not limited to at least:
- 16 21. Card No. XXXX-XXXX-XXXX-1023 in the name of C.D.;
- 17 22. Card No. XXXX-XXXXXX-X3001 in the name of S.H.;
- 18 23. Card No. XXXX-XXXX-XXXX-5177 in the name of A.P.;
- 19 24. Card No. XXXX-XXXX-XXXX-4548 in the name of C.S.;
- 20 25. Card No. XXXX-XXXXXX-X4003 in the name of B.A.;
- 21 26. Card No. XXXX-XXXXXX-X6002 in the name of A.M.;
- 22 27. Card No. XXXX-XXXXXX-X3008 in the name of J.W.;
- 23 28. Card No. XXXX-XXXXXX-X1572 in the name of T.A.;

- 1 29. Card No. XXXX-XXXXXX-X1871 in the name of S.W.;
- 2 30. Card No. XXXX-XXXX-XXXX-9083 in the name of S.P.;
- 3 31. Card No. XXXX-XXXX-XXXX-9317 in the name of F.C.;
- 4 32. Card No. XXXX-XXXXXX-X1000;
- 5 33. Card No. XXXX-XXXX-XXXX-2019;
- 6 34. Card No. XXXX-XXXX-XXXX-7415;
- 7 35. Card No. XXXX-XXXX-XXXX-7166;
- 8 36. Card No. XXXX-XXXX-XXXX-9303;
- 9 c) any and all notebooks, checks, and papers containing bank account
10 numbers including, but not limited to at least:
- 11 1. US Bank Account No. XXXXXXXX2273;
- 12 2. US Bank Account No. XXXXXXXX8023;
- 13 3. USAA Account No. XXXX5735;
- 14 4. Wells Fargo Account No. XXXXXX7123;
- 15 5. Schools First Credit Union Account No. XXXXXXXX5717;
- 16 6. Bank of America Account No. XXXXXXXX0455;
- 17 7. Chase Account No. XXXXX0809;
- 18 8. Wells Fargo Account No. XXXXXX9898;
- 19 9. New York Mellon Account No. XXX2883;
- 20 10. Bank of America Account No. XXXXXXXX9980;
- 21 11. US Bank Account No. XXXXXXXX3953;
- 22 12. US Bank Account No. XXXXXX1433;
- 23 13. Wells Fargo Account No. XXXXX8510;

- 1 14. USAA Account No. XXXX5735;
- 2 15. US Bank Account No. XXXXXXXXX5848;
- 3 16. Wells Fargo Account No. XXXXXXXXX8115;
- 4 17. Chase Account No. XXXXX2645;
- 5 18. Bank of Nevada Account No. XXXXXX0674;
- 6 19. Bancorp Account No. XXXXXX0231;
- 7 20. St. Charles Bank Account No. XXXXXX8768;
- 8 21. Wells Fargo Account No. XXXXXX0556;
- 9 22. Bank of America Account No. XXXXXX7687;
- 10 23. Wells Fargo Account No. XXXXXX5411;
- 11 24. Northern Trust Bank Account No. XXXXXX0003;
- 12 25. Bank of America Account No. XXXXXX0931;
- 13 26. Citibank Account No. XXXX6916;
- 14 27. Community Bank Account No. XXXX6556;
- 15 28. US Bank Account No. XXXXX0067;
- 16 29. Wells Fargo Account No. XXXXXXXXX7143;
- 17 30. Meadows Bank Account No. XXXXXXXX8817;
- 18 31. Bank of America Account No. XXXXXXXXX6625;
- 19 32. Bank of America Account No. XXXXXXXXX9565;
- 20 33. Bank of America Account No. XXXXXXXXX2797;
- 21 34. Eastern Bank Account No. XXXXXX6451;
- 22 35. Chase Account No. XXXXX8555;
- 23 36. Chase Account No. XXXXX0055;

1 37. US Bank Account No. XXXXXXXX4269;

2 38. Wells Fargo Account No. XXXXXX4077; and

3 iii. any and all stolen mail including, but not limited to at least 100 pieces of
4 mail

5 (all of which constitutes property)

6 and an in personam criminal forfeiture money judgment of \$2,500, and that
7 the property will not be applied toward the payment of the money judgment.

8 This Court finds the United States of America is now entitled to, and should,
9 reduce the aforementioned property to the possession of the United States of
10 America.

11 NOW THEREFORE, IT IS HEREBY ORDERED, ADJUDGED, AND
12 DECREEED that the United States of America should seize the aforementioned
13 property.

14 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that the United
15 States recover from Jason Lee Roberts an in personam criminal forfeiture money
16 judgment of \$2,500.

17 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED all right, title,
18 and interest of Jason Lee Roberts in the aforementioned property is forfeited and is
19 vested in the United States of America and shall be safely held by the United States
20 of America until further order of the Court.

21 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED the United
22 States of America shall publish for at least thirty (30) consecutive days on the official
23 internet government forfeiture website, www.forfeiture.gov, notice of this Order,

1 which shall describe the forfeited property, state the time under the applicable
2 statute when a petition contesting the forfeiture must be filed, and state the name
3 and contact information for the government attorney to be served with the petition,
4 pursuant to Fed. R. Crim. P. 32.2(b)(6) and Title 21, United States Code, Section
5 853(n)(2).

6 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that any
7 individual or entity who claims an interest in the aforementioned property must file
8 a petition for a hearing to adjudicate the validity of the petitioner's alleged interest
9 in the property, which petition shall be signed by the petitioner under penalty of
10 perjury pursuant to Title 21, United States Code, Section 853(n)(3) and Title 28,
11 United States Code, Section 1746, and shall set forth the nature and extent of the
12 petitioner's right, title, or interest in the forfeited property and any additional facts
13 supporting the petitioner's petition and the relief sought.

14 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED a petition, if any,
15 must be filed with the Clerk of the Court, 333 Las Vegas Boulevard South, Las
16 Vegas, Nevada 89101, no later than thirty (30) days after the notice is sent or, if
17 direct notice was not sent, no later than sixty (60) days after the first day of the
18 publication on the official internet government forfeiture site, www.forfeiture.gov.

19 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED a copy of the
20 petition, if any, shall be served upon the Asset Forfeiture Attorney of the United
21 States Attorney's Office at the following address at the time of filing:

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1 Michael A. Humphreys
2 Assistant United States Attorney
3 Daniel D. Hollingsworth
4 Assistant United States Attorney
5 501 Las Vegas Boulevard South, Suite 1100
6 Las Vegas, Nevada 89101.

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8 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED the notice
9 described herein need not be published in the event a Declaration of Forfeiture is
10 issued by the appropriate agency following publication of notice of seizure and intent
11 to administratively forfeit the above-described property.

12 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that the Clerk
13 send copies of this Order to all counsel of record and three certified copies to the
14 United States Attorney's Office, Attention Asset Forfeiture Unit.

15 DATED this 30 day of November, 2017.
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HONORABLE ANDREW P. GORDON
UNITED STATES DISTRICT JUDGE